

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

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BILLY MITCHELL,	:
	:
Plaintiff,	:
	:
-against-	: 3:15-cv-05668 (AET) (LHG)
	:
THE CARTOON NETWORK, INC., a New York	: DEFENDANTS' NOTICE OF
Corp., CARTOON NETWORK STUDIOS, INC., a	: MOTION TO DISMISS OR,
Georgia Corporation, TURNER BROADCASTING	: IN THE ALTERNATIVE, TO
SYSTEM, INC., a Georgia Corporation, John Does 1	: <u>TRANSFER VENUE</u>
through 10, fictitious designations,	
Defendants.	

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PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law in Support of Defendants' Motion to Dismiss or, in the Alternative, to Transfer Venue, dated September 28, 2015, the Declaration of Jonathan Strauss in Support of Defendants' Motion to Dismiss, dated September 28, 2015, and all Exhibits thereto, the Declaration of David C. Vigilante in Support of Defendants' Motion to Transfer Venue, dated September 25, 2015, all other pleadings and proceedings heretofore had herein, and all matters of which the Court may take judicial notice, defendants The Cartoon Network, Inc., Cartoon Network Studios, Inc. and Turner Broadcasting System, Inc. (collectively, "Defendants"), by and through their counsel, Loeb & Loeb LLP, will move this Court, before the Honorable Anne E. Thompson, United States District Judge at the Clarkson S. Fisher Building and United States Courthouse located at 402 East State Street, Trenton, New Jersey, on November 2, 2015, at 10:00 A.M., or as soon thereafter as counsel may be heard, for an Order, (1) dismissing plaintiff Billy Mitchell's Complaint with prejudice in its entirety for failure to state a claim upon which relief can be granted, pursuant to Fed. R. Civ. P. 12(b)(6), or, in the alternative, (2) transferring this action to

the United States District Court for the Central District of California in the interests of justice, pursuant to 28 U.S.C. § 1391 and/or 28 U.S.C. § 1404, and (3) granting such other and further relief as this Court may deem just and proper.

PLEASE TAKE FURTHER NOTICE that a Proposed Order granting Defendants' motion to dismiss or, in the alternative, to transfer venue is submitted herewith.

Dated: New York, New York
September 28, 2015

LOEB & LOEB LLP

By: /s Jonathan Strauss
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